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December 31, 2014

Via ECF

Hon. Alvin K. Hellerstein  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

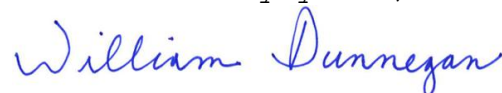
Re: Intellectual Ventures v. Citigroup, Inc. et al.  
14 Civ. 4638 (AKH)

Dear Judge Hellerstein:

Along with Feinberg Day Alberti & Thompson LLP, we represent plaintiffs in the above action. We are writing on behalf of all parties to submit a proposed Markman briefing schedule, in accordance with the December 10, 2014, order of the Court. (Dkt. 51)

1/13/15	Parties exchange claim terms to be construed and proposed constructions
1/23/15	Parties exchange responsive proposed constructions
2/13/15	Opening Markman briefs (simultaneous exchange)
3/6/15	Responsive/reply Markman briefs (simultaneous exchange)
3/11/15	Joint claim construction chart submitted to Court
3/25/15	Tutorial
3/26/15	Markman hearing

Sincerely yours,



William Dunnegan

cc: Kenneth Adamo, Esq. (By ECF)  
Gregory Lantier, Esq. (By ECF)